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SUBJECT: Responds to NRC 870804 ltr re violations noted in Insp Rept 50-400/87-26. Corrective actions: personnel received training re fuse labeling conventions & correct methods of determining component locations within equipment panels.

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NOTES: Application for permit renewal filed. 05000400

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AUG 28 1987

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Document Control Desk
United States Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

In reference to your letter of August 4, 1987, referring to I.E. Report RII: 50-400/87-26, the attached is Carolina Power & Light Company's reply to violation "B" identified in Enclosure 1.

It is considered that the corrective actions taken are satisfactory for resolution of the item.

Thank you for your consideration in this matter.

Very truly yours,

R. A. Watson
Vice President
Harris Nuclear Project

RAW:lkd

Attachment

cc: Messrs. B. C. Buckley (NRC)
G. Maxwell (NRC-SHNPP)
Dr. J. Nelson Grace (NRC)

IE01
1/1

Attachment to CP&L Letter of Response to NRC I.E. Report RII: 50-400/87-26 Violation "B"

Reported Violation:

B. Technical Specification 6.8.1.a requires that written procedures be implemented covering the procedures recommended in Appendix "A" of Regulatory Guide 1.33, Rev. 2., February 1978. Administrative Procedures are identified in Appendix "A" of the Regulatory Guide. Administrative Procedure AP-020 "Clearance Procedure" (Rev. 1), requires in step 5.1 that clearance personnel specify the appropriate power source when electrically isolating a valve.

Contrary to the above, on July 9, 1987, AP-020 was not implemented in that clearance personnel failed to correctly interpret the control wiring diagrams when clearance tagging the electrical solenoid for ammonia chemical addition valve 1AF-161. As a result, the fuses for the "C" steam generator feedwater regulating valve were incorrectly pulled, causing a reactor and turbine trip.

This is a Severity Level IV violation (Supplement 1).

Denial or Admission and Reason for The Violation:

The violation is correct as stated.

On July 9, 1987, Operations personnel were in the process of placing clearance OP-87-1290 to accomplish repairs to the solenoid of valve 1AF-161. This valve is the isolation valve for an ammonia supply to Steam Generator (SG) 'C'. The clearance was to be implemented by pulling fuses L5B/1967 and L6B/1967 located in Auxiliary Relay Panel (ARP) 1B-SB.

The clearance request as submitted, required the removal of fuses FU/6 ARP-1BSBF2 and FU/5 ARP-1BSBF2. The clearance center operator realized that this designation was not consistent with the current drawings and partially corrected the request to read L6B ARP-1BSBF2 and L5B ARP-1BSBF2. As shown on the drawing, the fuse numbers were L5B/1967 and L6B/1967; but the clearance center operator failed to include the Control Wire Diagram (CWD) sheet number designation of 1967 on the clearance. Two auxiliary operators were dispatched to the ARP to pull the fuses. The auxiliary operators understood the F2 designation to refer to the physical location of the fuses in the ARP. Plant vendor drawings showing the physical locations and layout of the fuse blocks within the ARP were not used. When the operators proceeded to ARP 1B-SB, they located fuses "5" and "6" in Front Rack 2 (F2) and assumed these to be the fuses to be pulled. These fuses are actually L5B/0803 and L6B/0803. This circuit enables the air supply to the Feedwater Regulating Valve for SG 'C'.

When the operators pulled the wrong fuses, it caused the Feedwater Regulating Valve for SG 'C' to shut, stopping feedwater flow to SG 'C'. This resulted in an automatic reactor/turbine trip at 1007 hours due to SG low-low level coincident with feedwater flow - steam flow mismatch. Subsequent to the trip, both Main Feedwater Pumps tripped actuating the Auxiliary Feedwater System.

The cause of the event was determined to be personnel error. The error was caused by a lack of attention to detail and a lack of systematic training on locating fuses in ARP's.

Corrective Steps Taken and Results Achieved:

Steam Generator Water levels were restored with the Auxiliary Feedwater System and the plant stabilized in Mode 3. The fuses (L5B/0803 and L6B/0803) which enable air supply to the Feedwater Regulating Valve were reinstalled. No safety consequences resulted from this event other than a challenge to the Reactor Protection system and the Engineering Safety Features Actuation system.

Corrective Steps Taken to Avoid Further Noncompliance:

Appropriate operations personnel have received training concerning fuse labeling conventions, proper clearance procedures and correct methods of determining component locations within equipment panels.

Date When Full Compliance Was Achieved:

Full compliance was achieved upon completion of training for appropriate operations personnel July 14, 1987.